

United States District Court

NORTHERN

DISTRICT OF

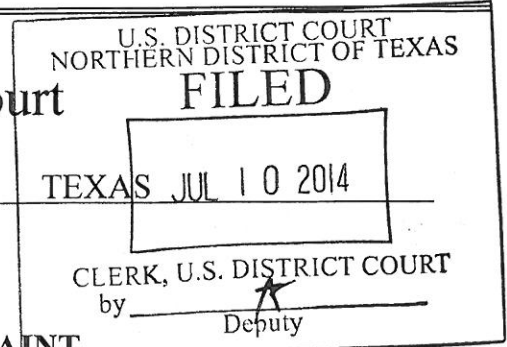
UNITED STATES OF AMERICA

V.

JONATHAN RAMIREZ

COMPLAINT

CASE NUMBER: 3-14-MJ-542-BK




I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 9, 2014, in the Dallas Division of the Northern District of Texas, defendant(s) did,

knowingly and intentionally possess prepubescent child pornography,
in violation of Title 18, United States Code, Section(s) 2252A(a)(5).

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

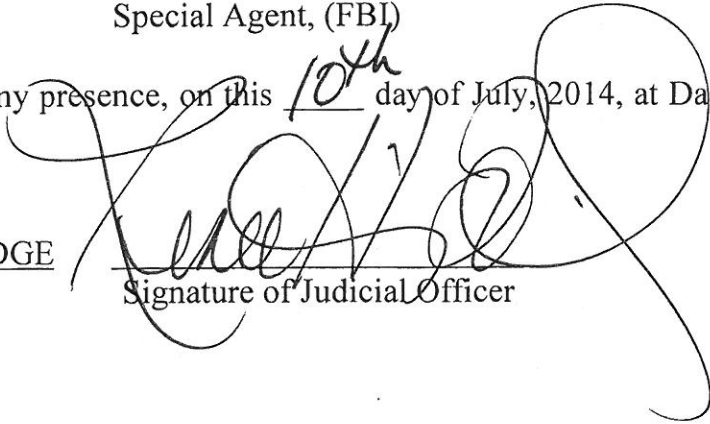
See attached Affidavit of Special Agent Marya Wilkerson, (FBI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Signature of Complainant
MARYA WILKERSON
Special Agent, (FBI)

Sworn to before me and subscribed in my presence, on this 10th day of July, 2014, at Dallas, Texas.

RENÉE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about July 9, 2014, in the Dallas Division of the Northern District of Texas, JONATHAN RAMIREZ knowingly possessed material which contains videos of child pornography, as defined in 18 U.S.C. §2256, that involved prepubescent minors, or minor who have not attained the age of 12 years, and which had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer.

Specifically, JONATHAN RAMIREZ possessed a LaCie external hard drive that contained the following files which Ramirez downloaded from the internet and transferred to the LaCie external hard drive from his laptop computer:

File Name	File Description
(sdpa)1yr (toddler serie).3gp	This video depicts a small female child, toddler age, who is lying naked on a white blanket. During the video, an adult male places his penis on the child's genital areas.
2013 pthc- falko toddler slidemovie.wmv	This video, which consists of image stillshots, depicts a small prepubescent female child. In one stillshot of the video, an adult female's tongue is being placed on the child's anus. In another stillshot of the video, a doll's plastic foot is being placed on the child's vagina. Most of the stillshots focus on the female child's genital area.
! new ! (pthc) 2007 tara 8yr-tara gets	This video depicts a nude, prepubescent female child, with a mask, lying naked

pissed on.avi	in a bathtub with her genitals exposed. An adult male's penis is visible during the video and the adult male urinates on the female child.
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In violation of Title 18, United States Code (U.S.C.) § 2252A(a)(5).

INTRODUCTION

1. I, Marya Wilkerson, further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since approximately April 2008. I am currently assigned to the FBI's Child Exploitation Task Force, Dallas, Texas, Division. As part of my duties as an FBI Special Agent, I am authorized to investigate violations relating to child exploitation and child pornography, including the receipt, possession, and distribution of child pornography, in violation of 18 U.S.C. §§ 2252, and 2252A. I have gained experience in conducting these investigations through training and through everyday work, to include executing search warrants and conducting interviews of individuals participating in the trading of child pornography. I have also received training relating to the Innocent Images National Initiative (IINI), FBI Cyber Program, which includes training in the investigation and enforcement of federal child pornography laws in which computers and other digital media are used as a means for receiving, transmitting, and storing child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that Jonathan Ramirez has violated Title 18, U.S.C § 2252A(a)(5). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a

criminal complaint charging Jonathan Ramirez with knowing possession of prepubescent child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offenses alleged in the complaint. The information contained in this affidavit is from my personal knowledge and from information provided to me by other law enforcement personnel involved in the investigation.

FACTS SUPPORTING PROBABLE CAUSE

3. On July 7, 2014, the Affiant obtained a federal search warrant for the residence of 1702 Danbury Drive, Garland, Texas, 75040. This search warrant was obtained after an investigation into the sharing of child pornography files, on a peer to peer file sharing network, by an IP address utilized from the residence of 1702 Danbury Drive, Garland, Texas, 75040.


4. On July 9, 2014, the Affiant executed the federal search warrant at the above residence. At that time, Jonathan Ramirez consented to an interview with this Affiant and admitted to using a peer to peer file sharing program on the internet to obtain child pornography files. Ramirez related that he would obtain the child pornography files from the peer to peer file sharing network on his laptop computer and would then transfer the files to his LaCie external hard drive.

5. On July 9, 2014, this Affiant has forensically reviewed and located multiple files of child pornography on Ramirez's LaCie external hard drive to include the three video files described above. These video files depict prepubescent child pornography as defined in 18 U.S.C. §2256(8).

6. Based on my training and experience, I am aware that the peer to peer filing sharing program is accessed through the Internet and is a mean and facility of interstate and foreign commerce. Also, LaCie is a French computer hardware company that is currently headquartered in Tigard, Oregon, with manufacturing plants outside the state of Texas. Furthermore, I have reviewed the files possessed by Jonathan Ramirez, and based on my training and experience, the video files appear to depict real minors engaged in sexually explicit conduct.

CONCLUSION

7. Based upon the aforementioned facts and circumstances, I believe there is probable cause to find that Jonathan Ramirez has knowingly committed a violation of 18 U.S.C. 2252A(a)(5), that is, possession of prepubescent child pornography. I therefore request the Court issue a warrant authorizing the arrest of Jonathan Ramirez.


Marya Wilkerson, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on this 10th day of July, 2014.


RENÉE HARRIS-TOLIVER
UNITED STATES MAGISTRATE JUDGE